

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c) Jeffrey E. Jenkins, Esquire <b>Jenkins &amp; Clayman</b> 412 White Horse Pike Audubon, NJ 08106 (856) 546-9696 Attorney for Debtor	
In Re: LaShon Cade  debtor	Case No.: 14-34871  Judge: MBK  Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**  
☐ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**  
☒ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned Chapter 13 proceeding hereby objects to the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by \_\_\_\_\_, creditor.

A hearing has been scheduled for \_\_\_\_\_

OR

- ☒ Motion to Dismiss filed by the Standing Chapter 13 Trustee, Albert Russo.

A hearing has been scheduled for September 17, 2019, at 9:00am.

- ☐ Certification of Default filed by \_\_\_\_\_, creditor

I am requesting a hearing be scheduled in this matter.

OR

- ☐ Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support of attached hereto.
- ☐ Payments have not been made for the following reasons and debtor proposes repayment as follows **explain your answer**): \_\_\_\_\_

\_\_\_\_\_

☒ Other (**explain your answer**): I fell behind with my Trustee payments because my son was very ill and was in the hospital and I needed to take care of him, so I was out of work for three months. I did have a wage order on my Trustee payments, but it would not be working if I'm not going to work. I was just ready to go back to work, and I went to the doctor and was diagnosed with breast cancer. I have to have both of my breasts removed this week. I will be out of work for 6-8 weeks after the surgery, but I will have some type of income after the surgery and I will get as much as I can to my attorneys for the Trustee. I understand that December is my 60<sup>th</sup> month and all that is left to pay in my bankruptcy is some of what was owed on my car. Accordingly, I ask that the motion be denied and to give me an opportunity to complete my case as I have been in the Chapter 13 for almost five years and have done pretty well in terms of payments.

- \_\_\_\_\_
3. This Certification is being made in an effort to resolve the issues raised by the creditor in this motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 8/15/2019

/s/ LaShon Cade  
LaShon Cade, debtor

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within ten (10) days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

**If this form is not filed the Motion or Certification of Default will be deemed uncontested**